

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION

DOROTHY RUTH PEEK

PLAINTIFF

v.

Civil No. 06-5003

SHERIFF TIM HELDER;  
DR. HOWARD; NURSE  
RHONDA BRADLEY; and  
NURSE SUSAN JOHNSON

DEFENDANTS

**ORDER**

On June 15, 2006, defendants filed a summary judgment motion (Doc. 18). To assist plaintiff in responding to the summary judgment motion, the undersigned is propounding a questionnaire. The court will consider plaintiff's response to the questionnaire in issuing a report and recommendation on the summary judgment motion.

For this reason, Dorothy Ruth Peek is hereby directed to complete, sign, and return the attached response to defendants' summary judgment motion on or before **August 18, 2006**.

**Plaintiff's failure to respond within the required period of time may subject this matter to dismissal for failure to comply with a court order.**

IT IS SO ORDERED this 17th day of July 2006.

/s/ Beverly Stites Jones

UNITED STATES MAGISTRATE JUDGE

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION

DOROTHY RUTH PEEK

PLAINTIFF

v.

Civil No. 06-5003

SHERIFF TIM HELDER;  
DR. HOWARD; NURSE  
RHONDA BRADLEY; and  
NURSE SUSAN JOHNSON

DEFENDANTS

**RESPONSE TO SUMMARY JUDGMENT MOTION**

TO: DOROTHY RUTH PEEK

These questions and answers will serve as your response to defendants' motion for summary judgment. You may use additional sheets of paper in responding to these questions.

You must file this response by **August 18, 2006**.

1. On March 19, 2003, a warrant for your arrest was issued based on your failure to appear on bad check charges.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 1.

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2. On August 27, 2003, the State of Arkansas filed a motion for revocation of your

probated sentence due to your failure to report as directed, your failure to make your whereabouts known to your supervising officer, and your failure to pay your fines.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at pages 2 and 3.

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3. Circuit Judge Gunn entered an order directing that a hearing be held on the motion for revocation of your probation and that a warrant be issued for your arrest.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 4.

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4. A warrant was issued on August 27, 2003, and entered into NCIC/ACIC on September 4, 2003.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at

page 5.

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5. On September 4, 2003, a warrant information sheet was prepared by the Washington County Sheriff's Office and assigned to L. Johnson.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 6.

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6. On January 28, 2004, you were arrested and brought to the Washington County Detention Center (WCDC). The intake sheet was completed by D. Smith and it was noted that you had a right sprained ankle.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 7.

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7. The intake sheet noted you were in violation of your probation and there was a hold on you by the Rogers Police Department.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 8.

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8(A). Your personal property was listed and you signed the list of your property.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 10.

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(B). The list did not show any prescription medications.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 10.

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(C). When you were brought to the jail did you bring your prescription medications with you?

Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

If you answered yes, please state: (a) the name of each medication you brought with you; (b) what medical condition the medication was for; (c) who prescribed the medication; and (d) whether you received the medication after you were booked in.

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If you answered no, please state why you did not bring your medication with you.

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9. On January 29, 2004, a warrant was served on you for violation of the Arkansas Hot Check Law and failure to appear.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 11.

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10. You were assigned jail property including a blanket, towel, uniform, shower shoes, mat, and identification bracelet.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at pages 11-13.

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11. On January 29, 2004, you signed a medical release and consent for medical services.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 14.

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12. A medical questionnaire was completed and you indicated you had epilepsy and had a seizure the prior Monday. You indicated you saw Dr. Guarv in Texarkana for seizures and took Dilantin twice a day. You also indicated your ankle was hurt.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 15.

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13. On January 29, 2004, you signed the inmate medical insurance information form indicating you were responsible for medical bills for treatment for any injury or illness that occurred prior to incarceration at that facility.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 16.

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14. You were seen by Nurse Bradley on January 29, 2004. You told Nurse Bradley you had a broken left ankle and had been to Washington Regional Medical Center (WRMC) the day before and had prescriptions at home for celebrex and hydrocodone.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 114.

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15. Nurse Bradley also noted that you took Dilantin and had last had it the prior day in the morning. You told Nurse Bradley you were treated by Dr. Guarv of Texarkana and last saw him about a month ago.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 114.

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16. Nurse Bradley called WRMC ER and spoke with a nurse named Suzy. Nurse Bradley faxed a request to WRMC asking for the x-ray report, the discharge instructions, and prescriptions from your ER visit on January 28, 2004, related to a left foot injury.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 17.

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17. Nurse Bradley also called Texarkana information to reach Dr. Guarv and found no Dr. Guarv listed. Nurse Bradley obtained a phone number for a hospital in New Boston, Texas, mentioned by you and found a Dr. Guarv there.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2, page 114.

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18. Nurse Bradley faxed a medical release to Dr. Guarv at the New Boston hospital. She requested medical records regarding your treatment for seizures, current prescriptions, and plan of care.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 18.

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19(A). Nurse Bradley received the emergency room records from WRMC on January 29, 2004.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 19.

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(B). The records indicated you had been seen complaining of pain in both ankles and problems with your ankles rolling while you walked.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 19.

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(C). You reported that you had not had any seizures since 1996 and were not taking medication for seizures.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 19.

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(D). You reported a past history of fracturing your right ankle in a fall with surgery

being performed in 1993.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 19.

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(E). X-rays of the ankle were negative. You were diagnosed with bilateral ankle pain. Your left ankle was placed in a splint stirrup and you were discharged with instructions to avoid activities that aggravated the pain. You were told to follow-up with an orthopedic physician.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 20.

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(F). You were given prescriptions for Celebrex and Ultram.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at

page 21.

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20. On January 31, 2004, a bail bond was issued for you by First Arkansas Bail Bond, Inc.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 22.

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21. You were released and received your property.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at pages 23 & 24.

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22. On April 28, 2004, Judge Gunn dismissed the motion for revocation, withdrew the warrant for your arrest, and reinstated the original conditions of your probation.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 25.

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23. On December 20, 2004, a warrant was issued for your arrest based on your failure to appear and failure to pay your court fines.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.



If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 26.

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24. On March 13, 2005, Judge Storey set an arraignment date of April 6, 2005, and a bond amount of \$3,500 on you.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 28.

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25. You were arrested on March 15, 2005, by the Springdale Police for probation violation, obstruction of governmental operations, public intoxication, and failure to appear.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 31.

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26. You were booked into the WDC on March 16, 2005 by Officer Roy.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 32.

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27. You completed a medical questionnaire on which you indicated you had asthma,

epilepsy/seizures, and had a cracked right knee/damaged knee cap. You indicated you took Dilantin for seizures and had last had a seizure three weeks before. You also indicated you had hydrocodone for pain for your knee cap and an Albuterol inhaler. You indicated your doctor was Dr. James at N.W. Medical.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 33.

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28. You signed a medical release and informed consent for medical services.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 34.

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29. You signed an inmate medical insurance form which indicated you were responsible for any treatment for injuries or illness that existed prior to your incarceration at the facility.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 35.

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30. You were seen by Nurse Bradley on March 16, 2005. She noted you reported being under a doctor's care and indicated you had damaged your right knee two weeks ago. You told Nurse Bradley you had a torn ligament. You also indicated you had a seizure three weeks ago and were taking Dilantin, 100 mg., twice a day. You stated you had last had Dilantin the morning before.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at

page 36.

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31. On March 16, 2005, you were given a misdemeanor citation and told to appear in Rogers for court on April 25, 2005.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 38.

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32. On March 16, 2005, you were also given a felony citation for violation of probation.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at

page 39.

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33. On March 16, 2005, a fax was received from Mike Parker, a probation officer, regarding your probation violation. It indicated you had been placed on probation on March 7, 2003, for four years and absconded June 2003. The revocation was dismissed on April 27, 2004.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 43.

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34. On March 16, 2005, your intake sheet was completed by Officer Reynolds who noted that you reported taking hydrocodone and Dilantin but did not have the medications with you.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 44.

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35. On March 16, 2005, you submitted a request asking when your court date was and whether you had a bond. In response, you were told a Rule 8.1 hearing was scheduled for March 18th and no bond had been set yet.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 48.

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36. You were released on March 17, 2005, due to overcrowding and your personal property was returned to you.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at pages 49-52.

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37. On April 5, 2005, the State of Arkansas filed a motion for revocation of your probated sentence.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 53.

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38. On April 6, 2005, you were given arraignment information and were to appear for arraignment on April 6th at 7:45 a.m.



Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 57.

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39. On April 6, 2005, you were found in contempt for failing to appear for arraignment and an arrest warrant was issued on the revocation petition. Your bond was ordered forfeited.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 58.

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40. On April 14, 2005, an arrest warrant was ordered to be issued for your failure to appear and a felony citation issued.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at

page 59.

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41. On April 25, 2005, an arrest warrant was issued.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 60.

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42. On May 20, 2005, the Washington County Sheriff's Office prepared a warrant information sheet.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at

page 61.

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43. On June 1, 2005, the warrant information was entered into ACIC/NCIC.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at page 62.

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44. On July 5, 2005, you were served with the warrant.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 1 at pages 62-63.

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45. You were booked into the WCDC on July 5, 2005, on the contempt of court

charge and on a hold for the Rogers District Court.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 1.

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46. You completed a medical questionnaire indicating you had problems with epilepsy/seizures, took Dilantin for this and had a seizure about every three months, had a deep cut on your pinky toe, were under the care of Dr. Berry at the Springdale Hospital and had attempted suicide three weeks ago. You indicated you were no longer suicidal.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 2.

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47. Your intake was completed by Van Hoosen. It was noted that you had an infection on your left little toe.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 4.

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48. On July 6, 2005, you were transported to court for a Rule 8.1 hearing and your bond was changed to \$50,000.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 6.

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49. On July 6, 2005, you were assigned jail property, signed a medical release and informed consent, and signed an inmate medical insurance information form.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at pages 7-9.

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50. On July 6, 2005, you submitted a medical request asking for Dilantin for seizures, Ibuprofen, and neosporin.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 10.

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51. On July 7, 2005, you submitted a request asking to see the nurse that day. You said you had swelling, redness and itching.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 13.

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52. In response, the nurse stated you should have an ice pack, Ibuprofen, and Tylenol for five days.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 13.

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53. On July 7, 2005, you were seen by Nurse Bradley. You told Nurse Bradley you had seizures and were being treated by Dr. Berry of Northwest Medical Center. You stated you last had your medication the prior evening.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 115.

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54. On July 9, 2005, you asked for information on your court dates and holds. You were told court was scheduled for July 29th and you had no more holds.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 15.

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55. On July 12, 2005, you submitted a medical request. You complained of pain in your left arm and left side of your chest. You also stated you were red in the face and had a headache.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 17.

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56. Nurse Bradley saw you on July 13th. She noted that you complained of a headache and stated it was a migraine. She gave you Excedrin Migraine, two tablets, twice a day, for three days.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 17 .

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57. On July 12, 2005, you submitted a request stating you needed to know who your public defender was. You stated that you needed to be to be able to talk to your kids. In response, you were told the WCDC did not know who your public defender was but the public defender's office would be faxed your request.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 18.

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58. On July 13, 2005, you stated you needed to talk to the corporal regarding your kids because the friend who was keeping them was moving to Texas. You stated you needed your bond reduced. In response, you were told WCDC staff could not get involved in legal matters or bond reduction and you would have to speak to your attorney.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 20.

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59. On July 15th you asked for two legal envelopes. You were provided the envelopes.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 21.

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60. On July 16, 2005, you requested medical care. You indicated you had been in an accident 3 ½ weeks ago and your right arm, shoulder, and hand hurt really bad. You stated you were supposed to have surgery. You asked to have something for the pain. You asked for Tylenol or anything.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 22.

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61. On July 20th you were seen by the doctor. He noted you claimed to have been in a motor vehicle accident and complained of pain in your right arm and shoulder. You were prescribed Ibuprofen.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at

page 114.

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62. On July 21st you requested medical care for red and irritated eyes. Nurse Bradley gave you chloraphenramine, 4 mg., for three days.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 23.

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63(A). On July 22, 2005, you asked to have a regular tray for lunch and supper. In response, on July 23, 2005, Nurse Johnson put you on a regular diet.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 25 & page 27.

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(B). What kind of diet had you been on?

Answer:

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(C). Why were you on a special diet?

Answer:

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64. On July 23, 2005, you requested medical care. You stated your throat was swelling, you were dizzy and light headed, and you were shaking uncontrollably.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 26.

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65. Nurse Bradley was contacted and advised jail staff to give you Benadryl.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 26.

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66. Nurse Bradley then came to check on you and noted no throat swelling and that your skin was dry and warm. You were still shaking and Nurse Bradley told you to drink plenty of fluids.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at

page 26.

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67. On July 29, 2005, you appeared in court and your bond was changed to \$2,500. You plead not guilty to the contempt of court charge. You were served with a post-arrest warrant for a probation violation, a violation of the hot check law, and failure to appear.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at pages 29-30.

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68. On July 30, 2005, you submitted a medical request stating you had slipped and fell off the bed hitting your side and back on the bar. You stated the pain in your back was major.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at

page 31.

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69. You were seen by Nurse Johnson who noted no redness, no swelling, and no bruising.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 31.

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70. On August 2, 2005, you requested a pregnancy test because you had not had a period in three months. You also stated that your back was hurting and your stomach swelling.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at



page 33.

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71. On August 3rd Nurse Bradley responded that a pregnancy test would be done.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 33.

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72. On August 5, 2005, you were released after you bonded out.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at pages 34-36, 38-39.

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73. On September 27, 2005, an order for the issuance of an arrest warrant for you was entered by Judge Gunn after you failed to appear in court on September 16, 2005. Bail bond was set at \$150,000.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at pages 40.

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74. An arrest warrant was issued that same day for your arrest for contempt of court, violation of the hot check law, and failure to appear.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 41.

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75. On October 6, 2005, you were discharged from Northwest Medical Center after being treated for pelvic pain. You were instructed to follow up with AHEC clinic in Springdale in three to five days. You were prescribed Lortab and doxycycline.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at pages 44-45.

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76. You were arrested on October 6, 2005, by the Springdale Police Department. You were booked and then released to the Washington County Sheriff's Office.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 46.

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77. You were booked into the WCDC on October 7, 2005. A medical questionnaire was completed as part of the intake. You reported suffering from depression. You also indicated you had epilepsy and had been having two seizures a day lately. You indicated you had been bleeding heavily for three weeks and had a pelvic infection. You also stated you fell at the Motel 8 in Springdale the prior Friday and sprained your right knee. You indicated you had prescriptions for hydrocodone and doxycycline but had not filled them. You also indicated you had cut your wrists two weeks before trying to commit suicide but stated you were no longer suicidal.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 52.

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78. You were evaluated by Nurse Johnson who felt you could be placed in B pod.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain.

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79. On November 7, 2005, note was made that you had a questionable red dye allergy.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 57.

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80. On October 8, 2005, you submitted a request to see the nurse. You stated you needed your antibiotics for your bad pelvic infection and something for the pain. You stated you had a doctor's order.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 58.

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81. Nurse Johnson noted that the jail doctor had not given the order for the antibiotics. Instead, it was an ER physician. She stated you would be given the antibiotic until you saw Dr. Howard on October 12th.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 58.

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82. On October 9, 2005, you were moved from cell B to MH2 because of multiple seizures.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 59.

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83. On October 12, 2005, you were treated by Dr. Howard for dizzy spells and ears hurting.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 116.

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84. On October 13, 2005, Corporal Sharp and Deputy Western responded to a report of a seizure in progress in "J" block. They found you lying on your mat on the floor. You were clutching your chest saying it hurts. You complained of a sharp bruising pain just inside and slightly below your right breast.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 65.

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85. While Sharp and Western were talking to you, you began to pump your legs up and down. Western raised your right arm with no resistance. Cell mates indicated this was your second seizure. You were awake and were able to talk and answer questions. Your upper body and arms were relaxed. Your blood pressure and heart rate were normal.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 65.

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86. On October 14, 2005, you were transported to court and pled guilty. You were sentenced to serve 1 ½ years.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at pages 61 & 66.

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87. You were given a judicial transfer to the Department of Community Punishment and signed the form stating that you understood you must abide by the rules or be transferred back to the Department of Correction.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 62.

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88. On October 17, 2005, you submitted a medical request. You stated you had severe chest pain. You indicated you had previously had problems with your potassium level and the symptoms were similar.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 67.

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89. The nurse was contacted and she stated she would check you in the morning. She did and noted your chest was bruised. She prescribed Ibuprofen for five days.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 67.

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90. On October 19, 2005, Nurse Bradley was called to A pod because you were unresponsive and laying on the floor on your side. Nurse Bradley noted no seizure activity but you refused to respond to verbal stimuli. You opened your eyes and rolled away as soon as an ammonia inhalant was busted. Your blood pressure was checked.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 116.

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91. On October 19, 2005, Dr. Howard noted that you reported that you passed out from low potassium. Dr. Howard ordered a check of your potassium and CBC and noted: “? seizure disorder.”

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants’ exhibit 1, Vol. 2 at page 116.

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92. On October 20, 2005, your blood was drawn for routine blood counts.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants’ exhibit 1, Vol. 2 at page 68.

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93. Your potassium level was found to be 4.4 which was within the normal reference range.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 69.

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94. On October 21, 2005, you were observed by Nurse Johnson who noted no seizure activity.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 116.

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95. On October 22, 2005, you were observed by Nurse Johnson who noted no seizure activity.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 116.

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96. On October 24, 2005, you were seen by Nurse Bradley after complaining of falling and hitting the left side of your face, right shoulder, and neck on the toilet. Nurse Bradley noted no redness, bruising, or deformities.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 117.

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97. On November 5, 2005, you requested medication or a wrap for your left hand. Nurse Johnson prescribed antibiotic cream for a scrape on your left knuckle and noted there was no swelling. Nurse Johnson also noted that you stated you sometimes had a headache.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 72.

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98. On November 6, 2005, you requested treatment for a big knot on the back of your leg that was making your leg feel numb.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 73.

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99. Nurse Johnson examined you and noted you had a small fatty knot behind your right knee. She put you on the list to see the doctor.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 73.

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100. On November 7, 2005, you submitted a grievance asking to return to your pod. You complained that you felt like you were being punished for being sick. Sgt. Charles responded that he would look into it.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 75.

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101. On November 9, 2005, you were seen by Dr. Howard. He prescribed Ibuprofen for your right leg.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 117.

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102. On November 10, 2005, you asked to be moved to A pod or G pod. You stated you wanted to be around your friends. You stated you would not have any more seizures. In response, you were told you were not going to be moved at that time.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 76.

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103. Please state when you were moved to an observation cell and the reason you were moved to an observation cell.

Answer:

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104. On November 16, 2005, you asked to be moved to A pod. You stated you had not had a seizure in four days and were doing better. In response, you were told to contact Sgt. Charles or Sgt. Mason since they had approved your placement in ISO4.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 78.

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105. On November 18, 2005, you submitted a medical request. You stated your right

leg was worse on the back. You indicated it was red and had gotten bigger. You stated you needed immediate medical attention.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 79.

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106. Nurse Johnson noted that the nodule behind your knee had not changed in size. However, she stated it was red from you rubbing it. She stated it was about the ½ the size of a dime. She put you on the list to see the doctor.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 79.

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107. On November 22, 2005, you were treated by Dr. Howard for a cyst behind your right knee. Dr. Howard ordered doxycycline for one week.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 117.

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108. On November 23, 2005, you submitted a medical request stating you had broken out in big, red whelps and needed to be seen.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 82.

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109. Nurse Johnson noted you had what appeared to be a possible allergic reaction to

the antibiotic. She stopped the antibiotic and started you on Benadryl. If it was not improving by the next day, you were to be given a Medrol dose pack.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at pages 82.

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110. On November 27, 2005, you submitted a grievance stating that your rash was worse and the knot on the back of your leg was worse. You stated another one was coming up next to it.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 83.

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111. Nurse Bradley responded that you had been taken care of.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 83.

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112. On November 29, 2005, you submitted a medical request asking for something to help you relax. You stated your grandmother had passed away and you were having difficulty sleeping.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 84.

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113. You were seen by Dr. Howard on November 30, 2005. He noted you were doing

better and recommended that antibiotic cream be applied until it was healed.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 117.

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114. On December 8, 2005, Nurse Bradley sent a health services request to the Arkansas Department of Correction (ADC) regarding your complaint of right leg swelling. The ADC approved your examination by the jail doctor.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 87.

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115. On December 9, 2005, you were seen in the emergency room of Northwest

Medical Center because you had a seizure. You were prescribed Dilantin.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 95.

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116. On December 14, 2005, you were seen by the doctor for a sore on your right leg which was healing.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 118.

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117. On December 14, 2005, you submitted a grievance about being locked down. You stated you needed to be with your friends. You stated you were being punished for being

sick.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 94.

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118. In response, you were told that due to your medical situation, personnel had to keep you in an environment more suitable and convenient for supervision.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 94.

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119. On December 17, 2005, you submitted a request to be moved out of ISO#4. You stated the new medicine was helping and it would be better for you to be with friends.



Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 98.

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120. In response, you were told you would remain in ISO#4 so you could be monitored for your safety.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 98.

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121. On December 21, 2005, you submitted a medical request stating your head was hurting bad and so was your underneath your ribs.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 80.

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122. In response, Nurse Bradley prescribed Tylenol and noted that you wanted out of ISO and had no seizures.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 80 .

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123. On December 22, 2005, you requested that you be moved out of ISO#4. You stated you had not had a seizure since the prior Wednesday. In response, you were told you would remain in there awhile longer so they could keep an eye on your medical.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 100.

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124. On December 28, 2005, you asked to be moved out of ISO#4. You stated you had not had a seizure in two weeks. In response, you were told you did much better while you were in the ISO#4. You were told they were afraid if they moved you out your seizures would start up again.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 101.

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125. On December 30, 2005, you submitted a request stating you had three bad teeth that were infected. You indicated they were making you sick to your stomach.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 105.

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126. Nurse Johnson noted that you were not complaining of a toothache. She stated you were worried about your leg. Your leg was bandaged and wrapped and your paperwork sent to the ADC.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 105.

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127. On December 31, 2005, Nurse Bradley completed a health services request form to be sent to the ADC regarding your care for seizures, abscessed teeth, and a boil on your right leg.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 106.

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128. On January 1, 2006, Nurse Moss was called to the ISO because your leg was bleeding. You were taken to the nurse's station and your leg cleaned. Your sore had popped open and drained the excess blood build up. The sore looked much better and you said there was less pressure and it felt better. The sore was redressed.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 118.

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129. On January 3, 2006, the ADC approved your evaluation and treatment for the seizures and boil by the jail doctor. Approval was also given for you to be treated by a local dentist for the abscessed teeth including application of antibiotics, simple fillings, and

extractions.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 107.

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130. On January 3, 2006, you submitted a request asking to be moved out of ISO#4. You stated you had been in there a month and had not had a seizure in two weeks. You stated your leg was very infected. In response, you were told that you were going to stay in ISO until further notice so you could be closely monitored.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 108.

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131. On January 4, 2006, you were seen by Dr. Howard. He examined the abscess around your right knee and noted it was still draining. He prescribed cephalixin for ten days and ordered the would re-dressed as needed.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 118.

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132. On January 13, 2006, you were treated by Nurse Johnson. She prescribed erythrocin for seven days and your dressing was changed.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 118.

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133. On January 16, 2006, Nurse Bradley noted you were crying and complaining of severe pain in the right knee area. You asked for stronger pain medication. Dr. Howard called and prescribed Ibuprofen, 600 mg., for three days, with Tylenol. You were placed on the list to see the doctor.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain.

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134. On January 17, 2006, you were released to the ADC for transfer to Pine Bluff.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 2 at page 113.

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135. From October 9, 2005, through November 4, 2006, you were on fifteen minute jail checks.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 3 at pages 1-46.

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136. You received a variety of medications including Dilantin while at the WCDC.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 1, Vol. 3 at pages 47 to 75.

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137. Medical records from Washington Regional Medical Center dated September 16, 2003, through February 20, 2005, indicate you were treated for an accidental overdose, left rib

pain, a sprained ankle, left arm, left leg, and back pain. There is no mention of you being treated for a “staph” infection.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants’ exhibit 2.

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138. When your intake physical was done at the ADC, note was made that you had an open ulcer on your right lower extremity.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants’ exhibit 3 at page 4.

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139. On January 17, 2006, during your intake physical note was made that you had a wound 216 mm width by 28 length on the inside right outer aspect of your right knee. The wound was red on the inside and blue bruising was noted ½ inch out around from it. No

drainage was noted at the time. Signs of infection were present. The wound was examined by the doctor, cleaned, and a dressing applied.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 3 at page 24.

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140. Your erythrocin tablets were discontinued and you were put on bactrim.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 3 at page 32.

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141. On February 3, 2006, you submitted a medical request because your prescription for antibiotics had run out. Note was made you had an infected knee and that it was oozing, raw, and sore. You were referred to the doctor for a re-order of antibiotics.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 3 at page 10.

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142. On March 2, 2006, note was made that the ulcerated lesion on your right leg had done significant healing and there was no sign of infection.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 3 at page 16.

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143. On March 19, 2006, you requested medical treatment because the scar was getting infected, turning red, and irritated. You were referred to the doctor.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 3 at page 8.

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144. While you have been at the ADC, you have had seizures a number of times.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain. In explaining, please refer to defendants' exhibit 3.

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145. You received all medical care Dr. Howard and the jail nurses believed, in the exercise of their medical judgment, that you needed.

Agree \_\_\_\_\_ Disagree \_\_\_\_\_ Without knowledge to agree or disagree \_\_\_\_\_.

If you disagree, explain.

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146. Do you contend Dr. Howard was deliberately indifferent to your serious medical needs?

Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

If you answered yes, please state what your serious medical needs were and how Dr. Howard exhibited deliberate indifference to your needs.

[illegible]

147. Do you contend Nurse Bradley was deliberately indifferent to your serious medical needs?

Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

If you answered yes, please state what your serious medical needs were and how Nurse Bradley exhibited deliberate indifference to your needs.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

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Answer: Yes \_\_\_\_\_ No \_\_\_\_\_.

[illegible]



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149. Sheriff Tim Helder personally made no decisions about the medical care you should received.

Agree\_\_\_\_\_ Disagree\_\_\_\_\_ Without knowledge to agree or disagree\_\_\_\_\_.

If you agree, please explain how you believe Sheriff Helder violated your federal constitutional rights.

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If you disagree, please explain how Sheriff Helder was personally involved in deciding what medical care you should receive.

[illegible]

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Detail below any further response you would like to make to defendants' summary judgment motion. If you have any exhibits you would like the court to consider, you may attach them to this response.

[illegible]

